

From: [James Trautwein](#)
To: [E-OHPSCA-STOPLOSS.EBSA](#)
Subject: Stop-Loss Insurance - Request for Comments
Date: Thursday, June 07, 2012 11:07:53 AM

Dear Sir or Madam:

I completely concur with the comment submitted by Professor Roger Baron.

Additionally, "reasonable expenses of administration" should be considered those expenditures essential to the functioning or administration of the Plan. Stop-loss and reinsurance policies are therefore clearly distinguishable from "reasonable expenses of administration" and should be subject to State laws and regulations on insurance.

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